

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND**

IN RE:	:	
	:	BK NO. 25-10270
TALLULAH'S TAQUERIA, LLC,	:	
	:	Chapter 11 (Subchapter V)
Debtor.	:	

**SUBCHAPTER V TRUSTEE'S LIMITED OBJECTION TO
MOTION TO DISMISS OR CONVERT CHAPTER 11 CASE**

Joseph M. DiOrio, the duly appointed Subchapter V Trustee ("Trustee") of Tallulah's Taqueria, LLC ("Tallulah"), a Rhode Island limited liability company, hereby objects on a limited basis to the Motion of United States Trustee to Dismiss or Convert Chapter 11 Case, filed on June 27, 2025 (the "Motion"). In support thereof, the Trustee states as follows:

1. On April 11, 2025, Joseph M. DiOrio was appointed as Subchapter V Trustee of Tallulah.
2. Since his appointment, Trustee has incurred \$3,496.50 in attorney's fees and \$161.85 in expenses, for a total of \$3,658.35 ("Trustee's Fees"), in connection with his performance of his responsibilities in this case. A true and accurate copy of the invoices detailing Trustee's Fees are attached hereto as **Exhibit A**.
3. The Trustee respectfully requests that the dismissal of the case be conditioned on the payment of Trustee's Fees.

WHEREFORE, the Trustee respectfully objects on a limited basis to the Motion and requests the Court condition the dismissal of the case on payment of Trustee's Fees.

Respectfully submitted:

Joseph M. DiOrio, Subchapter V Trustee

/s/ Joseph M. DiOrio

Joseph M. DiOrio (#2616)
Pannone Lopes Devereaux & O’Gara LLC
1301 Atwood Avenue, Suite 215 N
Johnston, RI 02919
(401) 824-5180/Fax: (401) 824-5123
jdiorio@pdlaw.com

Dated: July 2, 2025

CERTIFICATION

I hereby certify that on this 2nd day of July, 2025, I electronically filed the foregoing document in the above-captioned matter with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System. The following participants will receive notice electronically:

- Daniel E. Burgoyne dburgoyne@psh.com, kfrancois@psh.com
- Matthew J. McGowan Mmcgowan@sklawri.com, kgerman@sklawri.com
- Thomas P. Quinn tquinn@mclaughlinquinn.com, mwoodside@mclaughlinquinn.com
- Sandra Nicolls Sandra.Nicholls@usdoj.gov

I further certify that on this 2nd day of July, 2025, I have mailed by United States Postal Service, postage-prepaid, the document to the following non CM-ECF participants and interested parties on the attached Mailing Matrix.

/s/ Joseph M. DiOrio

EXHIBIT A



Joseph M. DiOrio
1301 Atwood Avenue Suite 215 N
Johnston, RI 02919

July 2, 2025
Invoice # 78868

REMITTANCE

RE: Tallulah's Taqueria, LLC

Client.Matter: 5406 - 10768
Billing Attorney: Joseph M. DiOrio

BALANCE DUE THIS INVOICE

\$ 3,658.35

Payment options are available by clicking on our Payment Portal at www.PLDOLAW.com . While there will be a processing fee for all Credit Card payments, you may also pay by Debit Card or e-check at no charge. If paying by check, please include your invoice number on the check and mail to:

PANNONE LOPES DEVEREAUX & O'GARA LLC
ATTN: ACCOUNTS RECEIVABLE
1301 Atwood Avenue, Suite 215N
Johnston, RI 02919

For questions regarding your bill, please contact your Attorney directly. For payment processing assistance, please contact our Accounting Department at 401-824-5140.

Terms: Net 30 days

Thank you! Your business is greatly appreciated.

Invoice #: 78868

July 2, 2025

Client.Matter: 5406 . 10768

RE: Tallulah's Taqueria, LLC

PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Rate	Amount
4/11/25	JMD	Call and email with Sandra Nicholls and David Quinn re meeting at business premises and interview of debtor; c	.20	495.00	99.00
4/11/25	JMD	Prepare statement of disinterestness for court filing	.20	495.00	99.00
4/17/25	JMD	View Ives Street business premises.	.50	495.00	247.50
4/17/25	JMD	Conduct Debtor's initial interview.	1.00	495.00	495.00
4/18/25	JMD	Call with Sandra Nicholls re case	.15	495.00	74.25
4/18/25	JMD	Call with T. Quinn.	.10	495.00	49.50
4/18/25	JMD	Call with S. Nicholls re. cash collateral and case.	.10	495.00	49.50
4/26/25	JMD	Review schedules and tax return	.35	495.00	173.25
5/07/25	JMD	Attend 341 Hearing.	1.10	495.00	544.50
5/14/25	JMD	Attend Status hearing.	1.50	495.00	742.50
5/30/25	JMD	Call with Tom Quinn re status and next steps	.20	495.00	99.00
5/30/25	JMD	Email from US Trustee's office re MOR	.10	495.00	49.50
5/31/25	JMD	Review proposed cash collateral order and email to Tom Quinn	.50	495.00	247.50
6/03/25	JMD	Email from Matt McGowan re status.	.10	495.00	49.50
6/10/25	JMD	Email to Matt McGowan re status	.10	495.00	49.50
6/23/25	JMD	Email to Tom Quinn ; review email from UST re MOR status	.10	495.00	49.50
6/24/25	JMD	Call with Tom Quinn re status	.20	495.00	99.00
6/25/25	JMD	Email and call with Sandra Nicholls re case status and next steps	.20	495.00	99.00
6/28/25	JP	Draft limited objection.	.80	225.00	180.00
Total Professional Services			7.50		\$ 3,496.50

TOTAL PROFESSIONAL SERVICES

\$ 3,496.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Joseph M. DiOrio	Partner	6.70	495.00	3,316.50
Javellys Polanco	Associate	.80	225.00	180.00
Total		7.50		\$ 3,496.50

Invoice #: 78868

July 2, 2025

DISBURSEMENTS ADVANCED

Date	Description	Amount
6/16/25	Reproduction Cost	114.52
7/02/25	Postage	47.53

TOTAL DISBURSEMENTS ADVANCED \$ 161.85

TOTAL THIS INVOICE \$ 3,658.35

Label Matrix for local noticing

Ally Bank

Ally Bank

0103-1

PO Box 380902

4515 N. Santa Fe Ave. Dept. APS

Case 1:25-bk-10270

Minneapolis MN 55438-0902

Oklahoma City, OK 73118-7901

District of Rhode Island

Providence

Wed Jul 2 11:12:53 EDT 2025

Ally Bank c/o AIS Portfolio Services, LLC

American Express

American Express National Bank

4515 N Santa Fe Ave. Dept. APS

PO Box 1270

c/o Becket and Lee LLP

Oklahoma City, OK 73118-7901

Newark NJ 07101-1270

PO Box 3001

Malvern PA 19355-0701

Baldor Specialty Inc

Daniel E. Burgoyne

CJ&J Trailer Leasing

155 Food Center Drive

Partridge Snow & Hahn LLP

dba Pilotte's Refrigeration

Bronx NY 10474-7136

40 Westminster Street, Suite 1100

34 Sears Road

Providence, RI 02903-2527

Swansea MA 02777-4517

(p)CAINE & WEINER COMPANY

Chef's Warehouse

Christopher P. Rhodes, Esq.

12005 FORD ROAD 300

249 Food Ctr Drive

Harrington & Rhodes, Ltd.

DALLAS TX 75234-7262

Bronx NY 10474

270 South County Trail

East Greenwich, RI 02818

Cintas

Citrin Cooperman

Corporation Service Company

P.O. Box 631025

500 Exchange Street, Ste 9-100

801 Adlai Stevenson Drive

Cincinnati OH 45263-1025

Providence RI 02903-2635

Springfield IL 62703-4261

Daniel E. Burgoyne, Esq.

Joseph M. DiOrio

Easy Ice, LLC

Partridge Snow & Hahn LLP

Pannone Lopes Devereaux & O'Gara LLC

PO Box 650769

40 Westminster Str, Ste 110

1301 Atwood Avenue

Dallas, TX 75265-0769

Providence RI 02903-2527

Suite 215 N

Johnston, RI 02919-4946

Ecolab Inc.

Farm Fresh Rhode Island, LLC

Financial Agent Services

PO Box 32027

10 Sims Avenue

P.O. Box 2576

New York NY 10087-2027

Providence RI 02909-1165

Springfield IL 62708-2576

Heller Properties LLC

(p)INTERNAL REVENUE SERVICE

Internal Revenue Service

Attn: Claude Goldstein

CENTRALIZED INSOLVENCY OPERATIONS

PO Box 7346

111 Fifth Street

PO BOX 7346

Philadelphia, PA 19101-7346

Providence RI 02906-2801

PHILADELPHIA PA 19101-7346

Jacob Rojas

Kelly Ann Rojas

Krost CPA's

12 Valley Street

32 Deck Street

225 S. Lake Ave., Ste 400

Jamestown RI 02835-1423

Jamestown RI 02835-2625

Pasadena CA 91101-3010

Krost CPA's / Eisner Amper

Liberty Cleaning Inc.

Matthew J. McGowan

225 S. Lake Ave

25 Stone Drive

Sylvia & Kiskfy LLC

Suite 400

Cranston RI 02920-1321

56 Exchange Terrace

Pasadena, CA 91101-3010

Providence, RI 02903-1772

Mobile Mini, Inc.
4646 E. Van Buren Street
Suite 400
Phoenix, AZ 85008-6927

(p) NAVIGANT CREDIT UNION
1005 DOUGLAS PIKE
SMITHFIELD RI 02917-1206

New England Certified Dev Corp
500 Edgewater Drive, Ste 555
Wakefield MA 01880-6232

Sandra Nicholls
U.S. Trustee's Office
U.S. Courthouse
One Exchange Terrace Suite 431
Providence, RI 02903-1744

Sandra Nicholls
Office of the U.S. Trustee
U.S. Courthouse
One Exchange Terrace Suite 431
Providence, RI 02903-1744

North Meadow Properties, LLC
109 Carr Lane
Jamestown RI 02835-1703

ODK Capital LLC
4700 W Daybreak Pkwy., Ste 200
South Jordan, UT 84009-5133

On Deck Capital
901 N Stuart St Ste 700
Arlington VA 22203-4129

Thomas P. Quinn
McLaughlin & Quinn
148 West River Street, Suite 1E
Providence, RI 02904-2615

Thomas P. Quinn
McLaughlinQuinn LLC
148 West River Street, Suite 1E
Providence, RI 02904-2615

RI Dept of Labor and Training
Employer Tax Unit
1511 Pontiac Avenue
Cranston RI 02920-4407

RI Division of Taxation
Bankruptcy Unit
co Richard P. Smith
Chief - Collection Section
One Capitol Hill
Providence, RI 02908-5816

RI Division of Taxation
Attn: Bankruptcy Unit
One Capitol Hill
Providence RI 02908-5801

Richard F. Hentz, Esq.
McGunagle Hentz, PC
2088 Broad Street
Providence RI 02905-3342

(p) U S SECURITIES AND EXCHANGE COMMISSION
ATTN BOSTON REGIONAL OFFICE
33 ARCH STREET 24TH FLOOR
BOSTON MA 02110-1424

State of RI - Labor and Training
Legal Department
Bldg 72 3rd Floor
1511 Pontiac Avenue
Cranston, RI 02920-4407

T.F. Kinnealey & Company
1100 Pearl Street
Brockton MA 02301-5410

Tallulah's Taqueria, LLC
146 Ives Street
Providence, RI 02906-3829

Tucker, Albin & Associates Inc
1702 N. Collins Blvd., #100
Richardson TX 75080-3662

U.S. Small Buisness Admin
2 North 20th Street, Ste 320
Birmingham AL 35203-4002

U.S. Small Business Admin
380 Westminster St., Rm. 511
Providence RI 02903-3239

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Caine & Weiner
P.O. Box 55848
Sherman Oaks CA 91413

Internal Revenue Service
Insolvency Unit 4th Floor
380 Westminster Street
Providence, RI 02903

(d) Internal Revenue Service
Insolvency Unit - 4th Floor
380 Westminster Street
Providence, RI 02903

Navigant Credit Union
1005 Douglas Pike
Smithfield, RI 02917

(d) Navigant Credit Union
1005 Douglas Pike
Smithfield RI 02917

Securities and Exchange
Boston Regional Office
33 Arch Street 23rd Floor
Boston, MA 02110-1424

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Farm Fresh Rhode Island	(d)State of RI - Labor and Training	End of Label Matrix	
	Legal Department	Mailable recipients	50
	Bldg 72 3rd Floor	Bypassed recipients	2
	1511 Pontiac Avenue	Total	52
	Cranston, RI 02920-4407		